

1 MICHAEL A. JACOBS (CA SBN 111664)
MJacobs@mofo.com
2 ARTURO J. GONZÁLEZ (CA SBN 121490)
AGonzalez@mofo.com
3 ERIC A. TATE (CA SBN 178719)
ETate@mofo.com
4 RUDY Y. KIM (CA SBN 199426)
RKim@mofo.com
5 MORRISON & FOERSTER LLP
425 Market Street
6 San Francisco, California 94105-2482
Telephone: 415.268.7000
7 Facsimile: 415.268.7522

8 KAREN L. DUNN (*Pro Hac Vice*)
kdunn@bsflp.com
9 HAMISH P.M. HUME (*Pro Hac Vice*)
hhume@bsflp.com
10 BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, N.W.
11 Washington, D.C. 20005
Telephone: 202.237.2727
12 Facsimile: 202.237.6131

13 *Counsel for Defendants*
UBER TECHNOLOGIES, INC.
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER
TECHNOLOGIES, INC.'S AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBITS TO THEIR
MOTION TO COMPEL PRODUCTION
OF DOCUMENTS**

Judge: Hon. Jacqueline Scott Corley
Trial Date: October 10, 2017

Pursuant to N.D. Cal. Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (collectively, “Uber”) submit this administrative motion for an order to file under seal exhibits to Uber’s Motion to Compel the Production of Documents. Specifically, Uber requests an order granting leave to file under seal the confidential portions of the following:

Document	Portions to Be Filed Under Seal	Designating Party
Letter Brief to Compel Production of Documents	Highlighted Portions	Plaintiff
Exhibit 5 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 6 to the Pritt Declaration	Entire Document	Plaintiff

The highlighted portions of the Letter Brief and the entirety of Exhibits 5 and 6 contain information that has been designated by Waymo as “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case. (*See* Declaration of Maxwell V. Pritt in Support of Uber’s Administrative Motion to File Documents Under Seal, ¶ 3.)

Pursuant to Civil Local Rule 79-5(d)(2), Uber will lodge with the Clerk the documents at issue, with accompanying chamber copies. Uber served Waymo with this motion on July 24, 2017.

For the foregoing reasons, Uber request that the Court enter the accompanying Proposed Order granting this administrative motion to file documents under seal and designate the service copies of these documents as “Highly Confidential – Attorneys’ Eyes Only.”

Dated: July 26, 2017

BOIES SCHILLER FLEXNER LLP

By: /s/ Karen L. Dunn

Karen L. Dunn

Counsel for Defendants
UBER TECHNOLOGIES, INC. AND
OTTOMOTTO LLC